

GABROY | MESSER
170 S. Green Valley Pkwy., Suite 280
Henderson, Nevada 89012
(702) 259-7777 FAX: (702) 259-7704

GABROY | MESSER
Christian Gabroy (#8805)
Kaine Messer (#14240)
The District at Green Valley Ranch
170 South Green Valley Parkway
Suite 280
Henderson, Nevada 89012
Tel (702) 259-7777
Fax (702) 259-7704
christian@gabroy.com
kmesser@gabroy.com
Attorneys for Plaintiff Tiare Ramirez

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TIARE RAMIREZ, an individual;

Plaintiff,

vs.

WYNN LAS VEGAS, LLC; DOES I
through X; and ROE Corporations XI
through XX, inclusive;

Defendant.

Case No: 2:19-cv-01174-APG-DJA

**STIPULATION AND ORDER TO EXTEND
DEADLINE FOR PLAINTIFF TO
RESPOND TO DEFENDANT'S MOTION
TO STRIKE (ECF No. 70)**

**STIPULATION AND ORDER TO EXTEND DEADLINE FOR PLAINTIFF TO
RESPOND TO DEFENDANT'S MOTION TO STRIKE (ECF No. 70)**

The parties by and through their respective attorneys of record, hereby stipulate to a fourteen (14) day extension through May 5, 2022 for Plaintiff Tiare Ramirez ("Plaintiff") to respond to Defendant Wynn Las Vegas, LLC's ("Defendant") Motion to Strike Plaintiff's Exhibit IX to Plaintiff's Opposition to Defendant's Motion for Summary Judgment (Defendant's "Motion to Strike," ECF No. 70).

Defendant filed its Motion to Strike on April 7, 2022. Plaintiff's response is currently due on April 21, 2022. Plaintiff has requested the extension and Defendant has agreed to the request.

Good cause exceedingly exists for such extension. Unfortunately, and as this Court is now aware, Plaintiff's trial counsel's immediate family member suffered a medical emergency, requiring intubation. Such individual remains under supervised care,

1 and unfortunately has very recently received an unfavorable diagnosis. This family
2 emergency has necessarily required a great deal of Plaintiff's trial counsel's time and
3 attention.

4 Accordingly, the parties agree that Plaintiff's response to Defendant's Motion to
5 Strike (ECF No. 70) shall be due on May 5, 2022.

6 This request is not sought for any improper purpose or other reason of delay. No
7 party is prejudiced by the requested extension.

8 **IT IS SO STIPULATED.**

9 Dated: April 19, 2022

Dated: April 19, 2022

10 Respectfully submitted,

Respectfully submitted,

11 /s/ Christian Gabroy

/s/ Kelsey Stegall

12 Christian Gabroy, Esq. (#8805)
13 Kaine Messer, Esq. (#14240)
GABROY | MESSER

Wendy Medura Krincek, Esq. (#6417)
Kelsey E. Stegall, Esq. (#14279)
LITTLER MENDELSON P.C.

14 *Attorneys for Plaintiff*

Attorneys for Defendant

15
16 **IT IS SO ORDERED.**

17
18
19 
20 UNITED STATES DISTRICT JUDGE
DATE: April 20, 2022